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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Cinque Robinson, and
Jasmine Robinson (minor child)

Plaintiff(s),

vs.

Village of Lansing Police Department,

Dennis Murrin, Jr. - Police Chief,
Detective Lieutenant Steve Roberts,
Officer Linda Monthie,
Defendant(s).

Officer Mike Lindemulder,

Sunnybrook School District 171,

Hughes B. George - Superintendent, and Cynthia Castaneda - Principal.

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

14CV9691
JUDGE DURKIN
MAG. JUDGE MASON

Case No.

RECEIVED

DEC X 4 2014

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.

2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.

3. Plaintiff's full name is Cinque Robinson, and Jasmine Robinson
(minor child)

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

4. Defendant, Officer Mike Lindemulder, is
(name, badge number if known)
- ☒ an officer or official employed by Village of Lansing Police Department
(department or agency of government)
- _____ or
- ☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Village of Lansing, Illinois. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.
6. On or about 9/19/14, at approximately 2:50 ☐ a.m. ☒ p.m.
(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of Lansing
_____, in the County of Cook
State of Illinois, at Nathan Hale Elementary School
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:
- _____
- _____

4. Defendant, Officer Linda Monthie, is
(name, badge number if known)
☒ an officer or official employed by Village of Lansing Police Department;
(department or agency of government)
 _____ or
☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Village of Lansing, Illinois. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.
6. On or about 9/25/14, at approximately 2:50 ☐ a.m. ☒ p.m.
(month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of Lansing
 _____, in the County of Cook
 State of Illinois, at Nathan Hale Elementary School
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

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- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:
- _____
- _____

4. Defendant, Steve Roberts, Detective Lieutenant, is
(name, badge number if known)
- ☒ an officer or official employed by Village of Lansing, IL Police Department
(department or agency of government) or
- ☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Village of Lansing, Illinois. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about ~~9/18~~ 9/19/14 and 9/25/14, at approximately 2:50 ☐ a.m. ☒ p.m.
(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of Lansing, Illinois, in the County of Cook.
- State of Illinois, at Nathan Hale Elementary School and Lansing Police Dept.
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

4. Defendant, Dennis Murrin, Jr., Police Chief, is
(name, badge number if known)
- ☒ an officer or official employed by Village of Lansing, IL Police Department
(department or agency of government)
- _____ or
- ☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

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(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of Lansing
_____, in the County of Cook

State of Illinois, at Nathan Hale Elementary and Lansing Police Dept.
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- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☒ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:
- _____
- _____

4. Defendant, Hughes B. George, Superintendent, is
(name, badge number if known)
~~an~~ an officer or official employed by Sunnybrook School District 171;
(department or agency of government) or
☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Village of Lansing, Illinois. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.
6. On or about 9/19/14 and 9/25/14, at approximately 2:50 ☐ a.m. ☒ p.m.
(month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of Lansing,
 in the County of Cook,
 State of Illinois, at Nathan Hale Elementary School,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

4. Defendant, Cynthia Castaneda, School Principal, is
(name, badge number if known)
- ☒ an officer or official employed by Nathan Hale Elementary School;
(department or agency of government)
- or
- ☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Village of Lansing, Illinois. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

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(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of Lansing
_____, in the County of Cook
State of Illinois, at Nathan Hale Elementary School
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

4. Defendant, Sunnybrook School District 171, is
(name, badge number if known)

☐ an officer or official employed by _____;
(department or agency of government)

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Village of Lansing, IL. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

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(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of Lansing
_____, in the County of Cook
State of Illinois, at Nathan Hale Elementary School
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (Place X in each box that applies):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

4. Defendant, Village of Lansing, IL Police Department, is
(name, badge number if known)

☐ an officer or official employed by _____;
(department or agency of government)

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Village of Lansing, Illinois. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 9/19/14 and 9/25/14, at approximately 2:50 ☐ a.m. ☒ p.m.
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_____, in the County of Cook

State of Illinois, at Nathan Hale Elementary and Lansing Police Dept.
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged):* It is the policy of the Lansing Police Department (Lansing, IL), to write citations for visitation interference and arrest offenders committing child abduction or aiding/abetting such offense.
8. Plaintiff was charged with one or more crimes, specifically:
I was not charged with anything, only threatened to be arrested. I was prevented by police and school officials, from picking up my daughter from school, despite a court order.
9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings
- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____
- ☒ Other: No criminal proceeding is, or was pending.

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

I attempted to pick up my daughter, pursuant to a court order, from her school. The school said they had a court order preventing me from picking up my daughter (on each of the dates listed in this documents). I went to the Lansing, IL Police Department to report the matter. The Police went to the school, where they were shown the court order, that states shows that I was to have visitation via a "No Unlawful Contact" order instead of a "No Contact Order." I approached Mr. Timothy Lapp, legal counsel for the Lansing, IL Police Department, who advised the police that I was to have visitation with my daughter. But the police refused to inform the school of such. They refused to write citations, also.

11.

12. As a result of defendant's conduct, plaintiff was injured as follows:

I lost visitation with my daughter, Jasmine Robinson, and her with me, despite a court order for such on 9/11/14, 9/19/14 and 9/25/14.

13.

Plaintiff asks that the case be tried by a jury. ☐ Yes ☒ No

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

I also asked each of the Defendants
in this case, to contact their respective
legal counsels about the matter.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

13. Plaintiff asks that the case be tried by a jury. ☐ Yes ☒ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Cingue Robinson

Plaintiff's name (print clearly or type): Cingue Robinson

Plaintiff's mailing address: P.O. Box 498114

City Chicago State IL ZIP 60649

Plaintiff's telephone number: (312) 813-2152

Plaintiff's email address (if you prefer to be contacted by email): _____

15. Plaintiff has previously filed a case in this district. ☒ Yes ☐ No

If yes, please list the cases below.

Cingue Robinson v. Wolfe, et. al

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.

The second Plaintiff is a minor child, Jasmine Robinson, my daughter is 8 years old.